



State of Utah

Department of
Environmental Quality

Richard W. Sprott
Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0141410001-08

July 16, 2008

Rulon Harper
Harper Contracting, Inc.
P.O. Box 18400
8201 West 5400 South
Kearns, Utah 84118

Dear Mr. Harper:

Re: Intent to Approve: Pelican Point Concrete Batch Plant
Utah County – CDS B; NA; NSPS; MACT; HAPs; TITLE V Minor
Project Code: N014141-0001

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any questions you may have on this project to Mr. Alan Humpherys. He may be reached at (801) 536-4142.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section

JTB:AH:sa

cc: Utah County Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Pelican Point
Concrete Batch Plant**

**Prepared By: Alan Humpherys, Engineer
(801) 536-4142**

Email: ahumpherys@utah.gov

INTENT TO APPROVE NUMBER

DAQE-IN0141410001-08

Date: July 16, 2008

Harper Contracting, Inc.

**Source Contact
Lawnie Mayhew
(801) 250-0132**

**M. Cheryl Heying
Executive Secretary
Utah Air Quality Board**

Abstract

Harper Contracting, Inc. has been operating a concrete batch plant under a portable approval order (DAQE-AN0110510011-07) and temporary relocation letter (DAQC-649-07) near Saratoga Springs, Utah County. Harper Contracting, Inc. has requested to make this a permanent site. A baghouse will control particulate emissions from the concrete batch plant, and a natural gas water heater/boiler will supply hot water to the plant. A diesel generator will supply power to the facility. This plant will produce 250,000 cubic yards of concrete per year.

Utah County is a Non-attainment area of the National Ambient Air Quality Standards (NAAQS) for PM_{10} .

New Source Performance Standards (NSPS) Subpart A (General Provisions) and Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) apply to this source. Maximum Achievable Control Technology (MACT) regulations Subpart A (General Provisions) and Subpart ZZZZ (National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) apply to this source. National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply to this source. Title V of the 1990 Clean Air Act applies to this source; however, this source does not require a Title V operating permit.

The emissions, in tons per year, will be as the following potential to emit totals: $PM_{10} = 5.11$, $NO_x = 11.59$, $SO_2 = 1.57$, $CO = 7.51$, $VOC = 2.10$, $HAPs = 0.10$

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in The Daily Herald on July 21, 2008. During the public comment period, the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed Approval Order conditions during this period and make any comments you may have. The proposed conditions of the Approval Order may be changed as a result of the comments received. Unless changed, the Approval Order will be based upon the following conditions:

General Conditions:

1. This Approval Order applies to the following company:

Site Office

Harper's Pelican Point Ready-Mix
10 miles South of State Highway 73
2 miles West of State Highway 68
Near Saratoga Springs, UT

Corporate Office Location

Harper Contracting, Inc.
8201 West 5400 South
P.O. Box 18400
Kearns, UT 84118

Phone Number (801) 250-0132
Fax Number (801) 250-0671

The equipment listed in this Approval Order shall be operated at the following location:

10 miles South of State Highway 73 and 2 miles West of State Highway 68, near Saratoga Springs, Utah County, Utah

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27
4,457.6 kilometers Northing, 425.4 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this Approval Order (AO) conform to those used in the UAC R307 and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO or in applicable NSPS and MACT regulations, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum periods:
 - A. 40 CFR Records Five years on-site for all NSPS and MACT records for the on-site processing equipment listed in this AO
 - B. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer
 - C. All other records Two years
6. Harper Contracting, Inc. (Harper) shall install and operate the concrete batch plant and shall conduct its operations of the Pelican Point ready-mix facility in accordance with the terms and conditions of this AO, which was written pursuant to Harper's NOI submitted to the Division of Air Quality (DAQ) on May 5, 2008 and additional information submitted to the DAQ on May 14, 2008 and June 2, 2008 June 26, 2008.
7. The approved installations shall consist of the following equipment or equivalent*:
 - A. One (1) Central Mix Concrete Batch Plant
 - Rated Capacity: 250 Cubic Yards per Hour
 - Control Device: Pulse Jet Baghouse

- B. One (1) 300 kW Diesel Generator***

Manufacture Date: Before April 1, 2006

- C. One (1) Hot Water Heater/boiler****

Rating: 10.0 MMBTU/hr

Fuel Type: Natural Gas

- D. Miscellaneous Processing Equipment **::

Hoppers, Conveyors, Fly Ash and Cement Storage Silos, Aggregate and Sand Storage Bins, Fuel Storage Tanks, Water and Admixture Tanks

- E. Miscellaneous Off-highway Vehicles**:

Loaders, Haul Trucks, Water Trucks

* Equivalency shall be determined by the Executive Secretary.

** This equipment is listed for informational purposes only.

*** 40 CFR 63 Subpart ZZZZ

**** 40 CFR 60 Subpart Dc

8. Harper shall notify the Executive Secretary in writing when the installation of the equipment listed in this AO has been completed and is operational. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If the construction and/or installation has not been completed within 18 months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the construction and/or installation. At that time, the Executive Secretary shall require documentation of the continuous construction and/or installation of the operation and may revoke the AO in accordance with R307-401-18.

9. Equipment listed in this AO that is not subject to a NSPS standard or MACT regulation can be replaced by other equipment of equal or lesser production capacity having the same function as the existing equipment with written notification to the Executive Secretary, in accordance with R307-401-11 "Replacement in Kind Equipment."

Limitations and Tests Procedures

10. Visible emissions from the following emission points shall not exceed the following values:
- A. All conveyor transfer points – 15% opacity
- B. All diesel engines – 20% opacity

C. Conveyor drop points – 20% opacity

D. All other points – 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

For sources that are subject to NSPS, opacity shall be determined by conducting observations in accordance with 40 CFR 60.11(b) and 40 CFR 60, Appendix A, Method 9.

11. Visible fugitive dust emissions from haul-road traffic and mobile equipment in operational areas shall not exceed 20% opacity at any point. Visible emission determinations for traffic sources shall use procedures similar to Method 9. The normal requirement for observations to be made at 15-second intervals over a six-minute period, however, shall not apply. Visible emissions shall be measured at the densest point of the plume but at a point not less than ½ vehicle length behind the vehicle and not less than ½ the height of the vehicle.
12. The following production and operating limits shall not be exceeded:
 - A. 250,000 cubic yards of concrete produced per rolling 12-month period
 - B. 3,744 hours of operation of the 300 kW diesel generator per rolling 12-month period.

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of production shall be kept for all periods when the plant is in operation. Production shall be determined by belt scale records, scale house records, vendor receipts, or similar reliable and verifiable record that is maintained onsite. The records of production shall be kept on a daily basis. Hours of operation shall be determined by supervisor monitoring and maintaining of an operations log.

Roads and Fugitive Dust

13. Harper shall abide by a fugitive dust control plan acceptable to the Executive Secretary for control of all dust sources associated with the Pelican Point ready-mix facility. Harper shall submit a fugitive dust control plan to the Executive Secretary, attention: Compliance Section, for approval within 30 days of the date of this AO.
14. Harper shall abide by all applicable requirements of R307-309 for Fugitive Emission and Fugitive Dust sources. Harper shall maintain records of treatments applied to control fugitive emissions.
15. All unpaved roads and other unpaved operational areas that are used by mobile equipment shall be water sprayed to control fugitive dust. Application of water shall be of sufficient frequency and quantity to maintain opacity limits listed in this AO. Records of water application shall be kept for all periods when the plant is in operation. The records shall include the following items:

- A. Date and time treatments were made
 - B. Number of treatments made and quantity of water applied
 - C. Date of rainfall received, if any, and approximate amount
16. Vehicle speed along the haul road shall not exceed 15 miles per hour. The vehicle speed on the haul road shall be posted, at a minimum, on site at the beginning of the haul road so that it is clearly visible from the haul road.
17. All displaced air from the concrete batch plant silos shall pass through a fabric filter device before being vented to the atmosphere.

Federal Limitations and Requirements

18. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, NSPS Subpart A, 40 CFR 60.1 to 60.18 (General Provisions), Subpart Dc, 40 CFR 60.40c to 60.48c (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) apply to this installation.
19. In addition to the requirements of this AO, all applicable provisions of 40 CFR 63, NESHAP for Source Categories Subpart A, 40 CFR 63.1 to 63.15 (General Provisions) and Subpart ZZZZ, 40 CFR 63.6580 to 63.6675 (National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) apply to this installation.

Records & Miscellaneous

20. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. Harper shall record all maintenance performed on the equipment authorized by this AO.
21. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
22. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the DAQ. The UAC R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source, fugitive emissions, fugitive dust, and road dust, and do not include tail pipe emissions and grandfathered emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for the entire plant are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/year</u>
A.	PM ₁₀	5.11
B.	SO ₂	1.57
C.	NO _x	11.59
D.	CO	7.51
E.	VOC	2.10
F.	HAPs	0.10

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section